



# MODERN SLAVERY STATEMENT

July 2021 - June 2022

**Universal Store**





# THIRD STATEMENT

This document is Universal Store's third Modern Slavery Statement. It outlines the steps Universal Store has taken to identify, assess and address Modern Slavery across our operations and our supply chain. This statement was prepared in accordance with the criteria set out in the *Modern Slavery Act 2018 (Cth)* for the year ending 30 June 2022.

This statement covers Universal Store Holdings Limited (ABN 94 628 836 484) as reporting entity as well as its owned subsidiaries:

- 
- Universal Store Pty Ltd
  - US Australia Pty Ltd
  - US 1A Pty Ltd, and
  - US 1BPty Ltd
- 

Universal Store Pty Ltd (ABN 89 085 003 158) is our trading company which undertakes all operational activities and maintains relationships with our suppliers.

US Australia Pty Ltd, US 1B Pty Ltd and US 1A Pty Ltd are administrative companies, are not undertaking operational activities and therefore have a very low Modern Slavery risk profile. The owned subsidiaries are under stewardship of the reporting entity and under the oversight of the Board and management of Universal Store Pty Ltd.

## Criterion 6 – Consultation

Consultation on the identification and management of Modern Slavery risks for the reporting entity and its subsidiaries has occurred as part of the preparation of this Modern Slavery statement.

Universal Store's Board and executive management are committed to respect human rights principles as described in the UN Universal Declaration of Human Rights and the workplace rights of the International Labour Organisation conventions. Universal Store acknowledges its responsibility to reduce the incidence of Modern Slavery in its operations and supply chain. Universal Store has zero tolerance for Modern Slavery in all forms.

# EXECUTIVE SUMMARY



**Transparency is one of the key pillars of Universal Store approach to sustainability. We are committed to identifying and addressing Modern Slavery risks and instances within our business and in our supply chain.**

The broader business strategy includes sustainability objectives and key results, and we are continuously striving to improve our performance around supply chain transparency and accountability.

This modern slavery statement for period July 2021 to June 2022 was approved by the principal governing body of Universal Store Holdings as defined by the *Modern Slavery Act 2018* on 24 November 2022.

This modern slavery statement is signed by a responsible member of Universal Store Holdings as defined by the *Modern Slavery Act 2018*.

A handwritten signature in black ink that reads "Alice Barbary". The signature is fluid and cursive.

**Alice Barbary**  
Chief Executive Officer, Universal Store

24 November 2022





# OUR PROGRESS

Since 2020, Universal Store has implemented a range of activities to identify, reduce and prevent modern slavery risks in its supply chain.

FY20

## BASELINE

Set up a dedicated internal Project team composed of representatives from Production, Human Resources, Project Management and senior representatives from the Product team to work collaboratively and develop an approach to Modern Slavery • Consulted on the risks specific to each area of the business • Completed a desktop audit of Universal Store's supply chain • Developed a modern slavery risk management plan.

FY21

## REVIEW

Engaged experts to assess the effectiveness and performance of existing processes • Hired dedicated resources increasing expertise on ethical sourcing • Reviewed the ethical policy framework to set expectations on suppliers' ethical practices • Developed a Modern Slavery Framework to guide implementation activities • Introduced a Supplier Code of Conduct • Provided in depth training on Modern Slavery to relevant teams • Introduced Leadership Team's remuneration incentive for ESG performance.

FY22

## EMBED

Continued supplier engagement • Selected technology solution to assess and address inherent risks in the supply chain • Launched our Sustainability approach to increase focus on Transparency in our supply chain • Developed Transparency targets to track and monitor progress • Enhanced internal capabilities of team members through training.

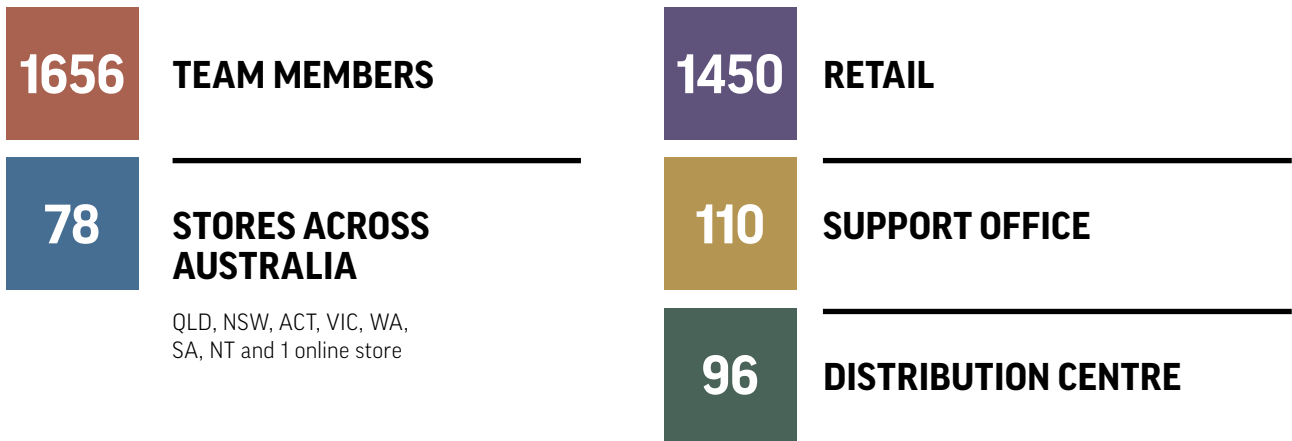
CRITERION 1 & 2

# ABOUT OUR COMPANY

Universal Store is a public company listed on the Australian Securities Exchange (ASX). Universal Store is a specialty retailer of youth casual apparel that operates 78 physical stores across Australia and a fast-growing online store.

The Company's strategy is to deliver a frequently changing and carefully curated selection of on trend apparel products to a target 16-35-year-old fashion focused customer. Universal Store seeks to provide a high level of customer service, consistent price proposition and a welcoming and engaging store environment. It offers a diversity of brands and styles to cater to the constantly evolving and widely varied tastes and trends observed in the youth apparel market.

## UNIVERSAL STORE



### PRODUCT BRANDS

**Private Label brands:**

Perfect Stranger, Common Need, Luck & Trouble, L&T, Token, Neovision

**100+ 3rd Party Brands:**

Thrills, Abrand, Tommy Hilfiger, Lee Wrangler, Kiss Chacey & Hanes Brands.

### OPERATIONS

**23**

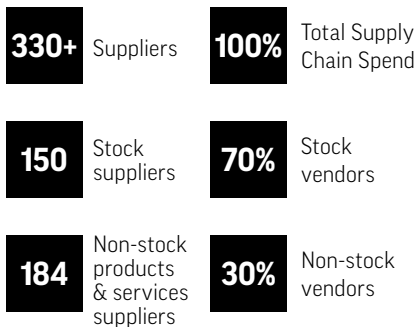
Private label suppliers producing across

Support office & Distribution centre located in Brisbane QLD

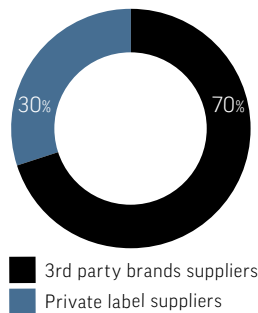
**38**

Factories owned by suppliers.

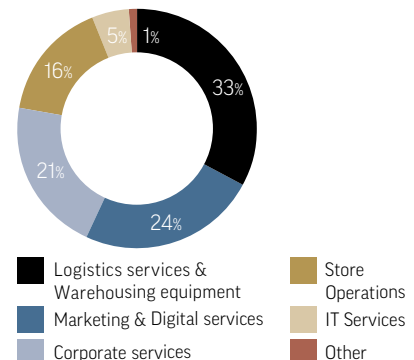
### SUPPLY



### STOCK SPEND (\$) BY TYPE OF SUPPLIER



### NON STOCK PRODUCTS AND SERVICES SPEND BY CATEGORY (%)



**“ Universal Store recognises the rights of team members to be represented and their ability to request collective bargaining aligned with the Fair Work Act. ”**

## **Governance**

The Board Audit and Risk Committee (ARC) approved our Modern Slavery framework aimed at reducing risks in the supply chain. The committee receives regular reporting on its implementation and risk management activities and provides challenge and guidance to further refine our approach.

## **Risk Management & Reporting**

The Chief Executive Officer and Leadership Team, in particular the Head of Sustainability and Ethical Sourcing collaboratively with the Head of Product are responsible for ensuring Universal Store meets our human rights obligations across our business activities. The CEO is a member of the Board of Directors and the Audit and Risk Committee, and reports regularly to Universal Store governance bodies on the progress of Universal Store's ethical sourcing programmes.

The 'Due Diligence Process' section of this statement highlights the governance, policy, operational and technology solutions we have activated during the period to increase Universal Store's capabilities in the identification and assessment of Modern Slavery risks.

The sustainability and ethical sourcing team is responsible for developing our ethical sourcing policies and implementing initiatives in collaboration with relevant internal teams and our suppliers. The Head of Sustainability and Ethical Sourcing reports to the CEO. Progress on these initiatives is regularly reported to the Board of Universal Store.

For further details on Universal Store's Corporate Governance structure and risk management framework, please review the company's Corporate Governance Statement.

## **Our Operations**

Modern Slavery risk in Universal Store own operations is low. At year end, we employed 1,681 team members, across retail operations, our Brisbane Support Office and our Distribution Centre.

The number of team members employed by Universal Store fluctuates throughout the year depending on the business activity.

## **Team members representation**

Universal Store recognises the rights of team members to be represented and their ability to request collective bargaining aligned with the Fair Work Act. All team members in our stores are paid in accordance with the General Retail Industry Award 2020. Other employees in our Support Office and Distribution Centre are on individual agreements based on the Modern Award that outline minimum pay, hours of work, deductions and leave entitlement, health and safety and conditions for termination of employment.

## **Vulnerable employees**

International migrant labour hires may be at heightened risk of exploitation including deceptive recruitment practices. At year end, we had 41 team members residing in Australia on a working visa, the majority of which were retail casual employees and 10 in administration and distribution centre roles.

We comply with the (Visa Entitlement Verification System (VEVO) requirements outlined by Australian law. Universal Store hires casual labour team members directly and during the reporting period did not make use of intermediary labour hire firms. If the need should arise in the future, we would only use labour hire that provided conditions aligned with the General Retail Industry Award.

Payroll practices Universal Store payroll practices are audited annually by an independent third-party.

## **Misconduct**

Employees, contractors, suppliers, and associates of Universal Store who may want to report a disclosable matter or potential misconduct are protected under the Universal Store Whistleblower Protection policy.

CRITERION 2

# OUR SUPPLY CHAIN

Whilst Universal Store does not own or operate any manufacturing facilities overseas, our aim is to build strong and long-lasting relationships with our suppliers. Our greatest opportunity to reduce risks of Modern Slavery sits with the production of our own private label garments and engagement with third party brands.

## Stock suppliers

The products Universal Store sells in store and online (i.e. stock) are sourced from a combination of suppliers. Stock products are either sourced from third party brands or manufactured for our private label brands by overseas manufacturers.

## INDUSTRY RISKS

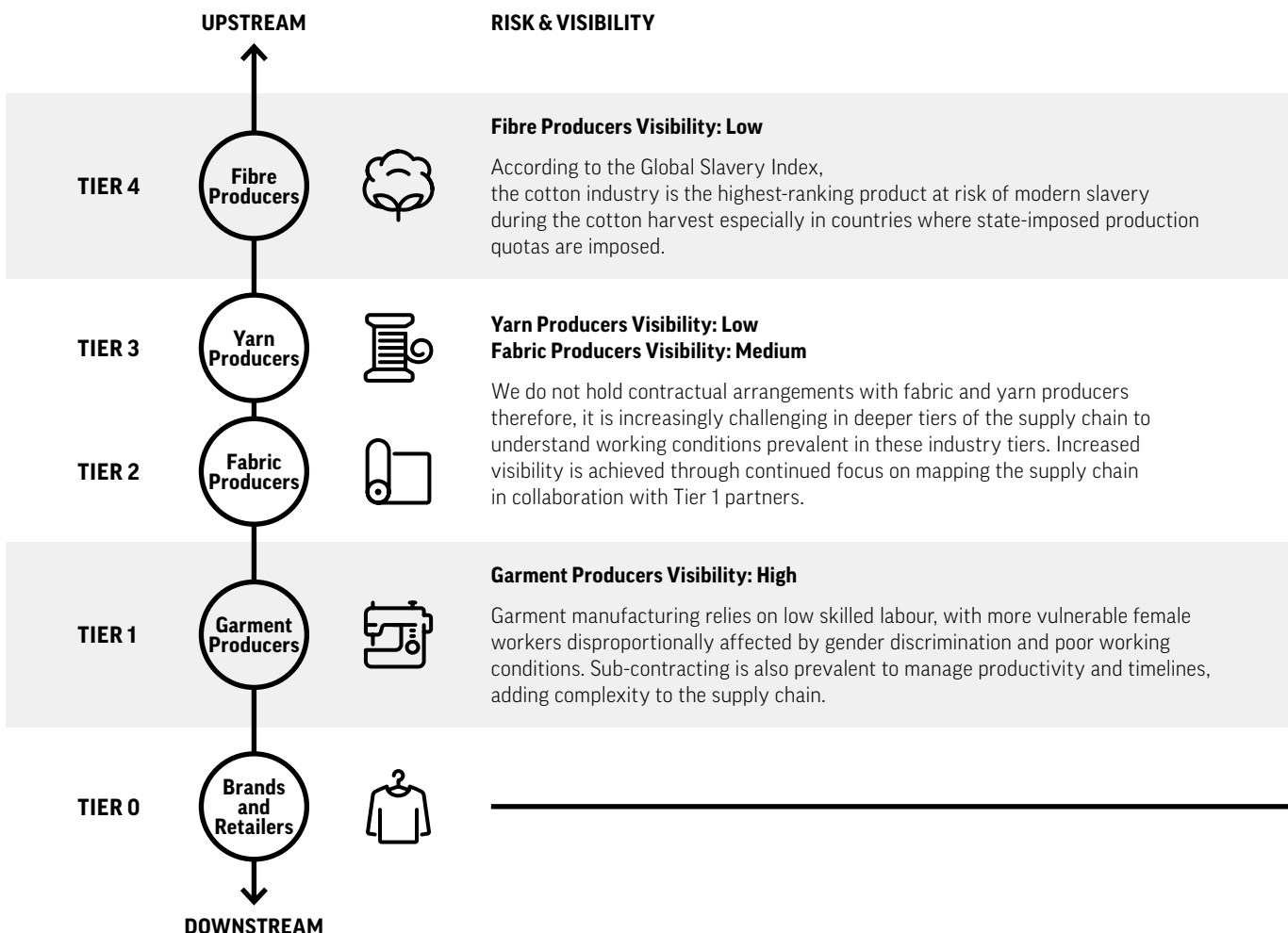
We categorise our supply chain stages into tiers so we can better understand our end-to-end supply chain and the different stages of production. It is also generally accepted in the clothing industry's value chain that each stage is referred to as 'tier', numbered backwards from the retail stage, as shown below:

“ We acknowledge there are specific risks to each Tier in the apparel supply chain. ”

Universal Store has direct relationships with suppliers and their production factories (together operating in Tier 1), allowing us to set ethical expectations and compliance requirements through contractual obligations.

Universal Store's terms of trade outline an obligation for the supplier to respect our code of conduct and its ethical principles. Exercising oversight of human rights risks beyond Tier 1 suppliers is a significant commercial and operational challenge.

We acknowledge there are specific risks to each Tier in the apparel supply chain.







# 95%

of our team members  
rated transparency  
as 'very important'  
or 'quite important'.

### COUNTRY RISKS

Modern slavery is more likely to occur in countries with weak rule of law, high levels of corruption, civil unrest and where population groups are vulnerable due to inequality, poverty, membership to persecuted groups or migrant population.

The majority of our private label brand products are supplied from factories located in China and two factories in Pakistan.

The prevalence of people living in slavery in China according to the Global Slavery Index is estimated to be 2.77 out of 1,000 people, placing the country in a relatively low category of Modern Slavery risk. In Pakistan however, the estimated portion of the population living in Modern Slavery is 16.82 for 1,000 people which is significantly higher and places the country in a high category of risk at country level.

## MAP OF SUPPLIERS



## COUNTERPARTY RISKS

As part of our ethical sourcing programme, Universal Store requires private label suppliers to provide details of management systems as part of its supplier on-boarding process.

This allows Universal Store to assess counterparty risk and identify relevant improvements required to reduce risks of Modern Slavery practices in its supply chain.

The assessment process focuses on Labour Standards, Health and Safety, Environmental Performance and Business Ethics which are reliable indicators of good corporate governance thereby reducing the risk of Modern Slavery practices in our supplier's operations.

## PRODUCT RISKS

The cotton supply chain has high likelihood of Modern Slavery practices. The international community, including the Australian government, has concerns over forced labour and oppression of the Uyghur Muslim minority in the cotton supply chain from the Xinjiang province in China.

Universal Store is closely monitoring the situation and will comply with any future government guidance. Meanwhile, we have provided policy guidance to our suppliers on this issue.

## Non-Stock Suppliers

Universal Store procures goods (not for resale) and services from other non-stock suppliers that are necessary to run our logistics, retail and support office activities. These non-stock suppliers are included in Universal Store's Modern Slavery risk assessment.

During FY22, we procured non-stock goods and services from 184 non-stock suppliers. We also continued analysing our supply chain including non-stock suppliers to get a better understanding of the risk exposure from non-stock procurement.

## Modern Slavery risks when sourcing from Australian suppliers

The risk of Modern Slavery occurring in Australia exists and is considered low in comparison with other countries. Some industries are more likely to be impacted than others by Modern Slavery practices. Industries that typically employ a high percentage of migrant workers in low skilled, temporary positions may have heightened risk of modern slavery occurring in their operations and workers may be more likely to become victims of labour exploitation.

In the reporting period, Universal Store spend with non-stock vendors was predominantly for goods and services from Australian suppliers (95% of spend value). A risk assessment of our top 20 non-stock suppliers (representing over two thirds of total non-stock spend for the period) identified that most of our vendors report under the Modern Slavery Act, have human rights position statements, undertake supply chain due diligence or operate in industry requiring highly skilled professional workers with low risk of modern slavery.

In FY23, we will engage with a selected number of vendors operating in high-risk industries (freight and store fitout construction) and that may rely on temporary casual workforce and where necessary, integrate provisions in our contracts to ensure dealings are undertaken in alignment with Australian laws and regulations and the principles of the Universal Store's Supplier Code of Conduct.





## CRITERION 3

# RISK OF MODERN SLAVERY PRACTICES

Modern slavery practices refer to situations of criminal exploitation including deprivation of liberties, human trafficking, forced or bonded labour, child labour, and forced marriage.

## Country Risks

The 2018 Global Slavery Index estimates that there are more than 40.3 million people in Modern Slavery around the world. 71% of these are female and 24.9 million in forced labour.

### SPECIFIC COUNTRY RISKS IN CHINA AND PAKISTAN

Labour standards risks in China are high. Key areas of risk include excessive working hours, discrimination, forced labour and freedom of association.

Doing business in Pakistan may present higher labour standards and health and safety risks. Pakistan ranks third highest country on the prevalence of Modern Slavery in Asia Pacific. Key areas of risk in Pakistan are access to and pollution to water, working hours, freedom of association and discrimination.

### RISK OF MODERN SLAVERY PRACTICES IN OUR INDUSTRY

The clothing industry is unfortunately one of the industries the most likely to have Modern Slavery victims in its supply chain. This is partly due to the fact the industry's supply chain is global, complex, multi-layered, and fragmented.

The Modern Slavery risks prevalent in our industry include:

- Unauthorised sub-contracting: Outsourcing labour needs to meet production demand introduces complexity into the supply chain. Contractors may not have the relevant licenses to conduct the work;
- Forced labour: The most common type of forced labour is overtime imposed through threats and punishment, penalty, or force;
- Child labour: Workers may be either too young to work, younger than the minimum age for employment or below the minimum age of compulsory education as per local laws and regulations;
- Deceptive recruitment/migrant labour: Engaging labour hire third parties to source workers increases the risk by reducing visibility over recruitment practices. Workers may be charged high fees to secure employment which they are unable to repay; and
- Exploitation of vulnerable workers: 70% of garment workers are female therefore it is imperative they work in an environment free of discrimination, and can benefit from equal pay, dignified working conditions and work security.

### Other risks in our industry include:

- Freedom of association
- Wages and social benefits
- Working hours
- Health and Safety

### Risks specific to suppliers

Since August 2021, Universal Store is a member of the Supplier Ethical Data Exchange (SEDEX), an online platform and industry community, which allows us to assess risk in our supply chain at country, industry, and commodity level. The system enables us to assess supplier specific risks and monitor site issues. This technology delivers a major improvement in our risk assessment process. Suppliers that are SEDEX members can submit a questionnaire to provide details of policies and procedures they have implemented to reduce the labour risks in their operations. Universal Store actively monitors the questionnaire completion by suppliers. We still rely on supplier enquiries and ongoing engagement for suppliers that are not SEDEX members.

The platform provides access to supply chain risk assessment tools enabling Universal Store to identify labour risk, human rights, governance and environmental risks across the business and our supply chain. Combined with the supplier and site level information, this provides powerful insights into hotspots and opportunities for future improvements such as development programmes and capability building initiatives required by suppliers.

Our risk assessment takes into consideration the performance of our suppliers against a set of standard criteria in various areas of performance including labour standards, health and safety, business ethics and environmental management.

Each supplier and their individual sites are scored on their ability to effectively manage labour and social risks. Through analysis of this information, Universal Store can quickly identify the risk level for sites on a range of high-risk areas such as forced labour, freedom of association, working hours, gender policies, discrimination, and employment practices, and freedom of association mechanisms.

### Action we take to assess and address risk

#### POLICY FRAMEWORK

Universal Store has a set of policy standards to articulate the business' position in respect to ethical conduct and modern slavery. Our corporate policies incorporate commitments to comply with laws and regulations and prohibits the worst forms of modern slavery.



**CORPORATE CODE OF CONDUCT**

Universal Store’s Code of Conduct applies to all employees and guides the business’ conduct in compliance with laws and regulations. The Code outlines the responsibilities that all employees must observe including acting with integrity, comply with all laws and regulations and act ethically and responsibly. Universal Store Code of Conduct is available on the company website and all employees are required to abide by the Code as a condition of their employment at Universal Store.

**SUPPLIER CODE OF CONDUCT**

Universal Store developed a new Supplier Code of Conduct to better align with industry standards, practices, and stakeholder expectations. The code applies to all suppliers of Universal Store and is available online.

The code includes minimum requirements, compliance and auditing mechanisms, and relevant audit standards to ensure its effective implementation. Universal Store Supplier Code of Conduct is based on the Ethical Trading Initiative Base Code founded on the conventions of the International Labour Organisation (ILO) and the SEDEX Member’s Ethical Trade Audit (SMETA) methodology.

Universal Store will continue to provide training on the Code of Conduct requirements for both employees with procurement responsibilities and key suppliers.

The 13 minimum requirements to be observed by suppliers are listed below:

1. No Child Labour
2. No forced Labour
3. Legal Migrant Labour
4. Respecting Human Rights in all operations
5. Working conditions are safe and healthy
6. Fair wages paid
7. Fair work hours
8. No bribery or corruption and act with integrity
9. Factory transparency
10. Valid business license
11. Environmental Protection
12. No use of banned raw materials or banned practices
13. Protect Animal Welfare

**BRANDS**

During the year we held discussions with Thrills, True Alliance, ThreebyOne, Hanes Brands and others to communicate our Supplier Code of Conduct’s expectations and review details of their corporate social responsibility policies. We believe it is essential to create a discussion platform with our key suppliers to share and work collaboratively on supply chain transparency and human rights issues. We will continue engage our brands and continue organise regular meetings with them to promote continuous improvement.

## CRITERION 4

# OUR DUE DILIGENCE PROCESS

### Industry collaboration

Universal Store has access to a range of consultants and industry experts that can provide guidance on best practices. We also participate in industry forum including the National Retail Association's Modern Slavery committee alongside other Australian retailers to share learnings on remediation, auditing, and grievance mechanisms.

### Transparency

Universal Store completed the mapping of Tier 1 private label suppliers and collected social compliance audit information for all Tier 1 manufacturing factories during the reporting period.

In addition, Universal Store actively engaged in Baptist World Aid Australia (BWA) Ethical Fashion survey to benchmark our practices and identify potential process improvements that can be made to our due diligence practices. We use the learnings from ethical surveys such as the BWA Ethical Fashion report as input to inform our ethical sourcing approach.

### Governance

Universal Store developed a structured framework to identify, manage and report on human rights issues and modern slavery risks in our supply chain. This framework continues to guide the implementation of initiatives and provide transparency and accountability for governing bodies.

### Team training

Universal Store, in cooperation with experts, developed specialist training for our Product team and support office team members involved in procurement activities. Two new training modules were added to our e-learning platform – Introduction to Universal Store Supplier Code of Conduct and Modern Slavery Awareness, which is made available to all new team members joining Universal Store. At year end, 100% of Product team members had completed their Supplier Code of Conduct training and 63% of Support Office team members involved in procurement activities had completed Modern Slavery awareness training.

“ Universal Store seeks to build long lasting relationships with suppliers that share our values. ”

### Supply chain Onboarding and monitoring

Universal Store does not own or operate any manufacturing facilities overseas, and we carefully onboard new suppliers based on their technical capabilities, capacity, and values.

We have implemented new steps as part of our supplier onboarding process to ensure manufacturing suppliers and third-party brands acknowledge the principles of our code prior to start working with us. We maintain a list of active suppliers and factories involved in the production of our goods and information supporting our suppliers' engagement activities. We record essential details on each facility to identify potential vulnerable workers in the supply chain:

- Supplier's endorsement of our Supplier Code of Conduct
- Worker total number at each site
- Workforce gender and migrant ratios
- Audit results

This information is made available in our factory list published here.

### Responsible purchasing practices

Universal Store seeks to build long lasting relationships with suppliers that share our values. Our partnerships with all suppliers are governed by documented standard terms of trade and payment terms. Our approach to sourcing is based on the commitment to work collaboratively with suppliers and ensure we work with them to set realistic timelines for production that are agreeable to both parties.

### Supplier engagement

Our Product teams work collaboratively with suppliers to ensure our suppliers' business practices align with the principles of our Supplier Code of Conduct. Third party brands and private label suppliers are expected to adopt our Supplier Code of Conduct as a requirement of our terms of trade.

We review international third-party brands' ethical policies to ensure their policies align with the principles outlined in our Supplier Code of Conduct. We continue to engage with all third-party brands to obtain their endorsement of our Supplier Code of Conduct and to get assurance that adequate policies, systems, and processes are available to manage Modern Slavery risks in their supply chain. At year end, 88% of third-party brands had endorsed our Supplier Code of Conduct or had equivalent ethical policies.

We expect all factories manufacturing private label goods to undertake annual social audits using a independent auditor and provide us with copies of the audit reports, corrective action plans, and follow-up audit reports. During the FY22 period, we mapped and obtained audits for 100% of our Tier 1 private label suppliers.

## Technology

Universal Store uses the SEDEX platform to assess inherent risks in the supply chain, engage with suppliers on their social performance, increase transparency and achieve continuous improvement. We continue to evaluate other systems such as training platforms to build capacity with suppliers and facilitate continuous improvement of their labour practices but also external grievance hotlines so workers can independently report concerns in full confidentiality.

## Reporting

Universal Store published its first annual Modern Slavery Statement in October 2020 for the FY20 period. The company also published information on the location of factories online. Universal Store will continue to meet its reporting requirements under the Modern Slavery Act and provide updates in subsequent statements on the progress of initiatives and their effectiveness in reducing modern slavery risk.



## Remediation processes

Universal Store takes reports of discrimination, bullying and harassment in the workplace very seriously and we have a zero-tolerance approach of matters of this nature. Employees that raise concerns through our internal formal grievance or whistle blower policies and matters are investigated as a matter of priority.

The Code of Conduct is provided to all suppliers in their local language and is expected to be communicated across their operations. Currently, Universal Store relies on its Whistleblower Policy, our contact details provided in the Supplier Code of Conduct and workers interviews held during independent audits as grievance mechanisms. To date, no instances of serious harm have been detected or communicated to Universal Store.

For private label suppliers, third-party audits outline non-conformances in suppliers' operations and identify remediation actions. We then request our suppliers to implement remediation actions and undertake follow-ups audits to verify continuous improvements.

We expect our 3rd party brands to be transparent and communicate to us any breaches to our Supplier Code of Conduct.

Should any material findings or breaches be discovered, Universal Store is committed to work collaboratively with our suppliers towards efficient resolution. However, should agreed remediation actions remain unaddressed, Universal Store would consider taking action to exit the supplier as a last resort.

## Impacts of COVID-19 on modern slavery risk

Our private label supply chain continued to be impacted by the COVID-19 pandemic during the reporting period. Our team was unable to travel to China and visit individual suppliers facilities.

We continued to work with our suppliers and negotiated reasonable timelines for delivery of the goods considering available capacity and restrictions.

The factories maintained COVID-19 safe workplace practices and worked in alignment with government and health authorities' guidance.

Disruptions due to COVID-19 impacted the timeliness of some factories audit programme. Universal Store was understanding of restrictions imposed and allowed suppliers some flexibility in the timing of audits.

COVID-19 lockdowns continued to impact workers movements and ability to travel to their place of work particularly in China which imposed health restrictions and lockdowns during the period. In FY22 we conducted welfare checks on impacted suppliers and factories experiencing temporary lockdowns due to health restrictions.





## CRITERION 5

# MEASURING EFFECTIVENESS

Universal Store is continuously seeking to improve its policies, procedures and actions in relation to Modern Slavery. In our first statement, we defined some key measures to monitor the effectiveness of our actions.

### Progress against our FY22 commitments

Most activities were completed whilst some are continuing.

Focus Area	Commitment	Progress
Supplier Code of Conduct	Continue to implement the Supplier Code of Conduct through provision of staff training and supplier engagement.	At year end, 100% of Product team members had completed their Supplier Code of Conduct training. The training is mandatory for new team members joining the Product team.
Training External	Continue to develop and provide ongoing basic training on human rights and modern slavery risks to existing staff and new members of staff through e-learning.	The Modern Slavery awareness training was developed and made available on our e-learning platform for all support office team members involved in procurement. We monitor the completion rates and encourage teams to complete the training.
Engagement	Continue to participate in industry disclosure initiatives to improve understanding of areas of improvement.	We have attended the National Retail Association Modern Slavery committee meetings during the year and worked collaboratively with other retailers on issues related to modern slavery in the supply chain.
Transparency	Continue assessing our supply chain risks across 3rd party brands, nonstock suppliers and in further tiers of our private label supply chain. Engage with key suppliers (incl. private label suppliers, 3rd party brands, business services providers) to discuss ethical sourcing principles.	We have provided further details of our risk assessment in this statement and this work will continue in FY23.
Technology	Leverage reporting functionalities provided by the ethical auditing platform to provide regular internal information on the social performance of suppliers to management. Evaluate technology enabled grievance mechanisms.	We have become members of the SEDEX platform, trained our team to using the tools available in the system and continue to refine our internal reporting on labour risks and performance based on the insights delivered by the platform.
Reporting	Continue to meet reporting requirements under the Modern Slavery Act. Continue to publish factory lists and locations to our sustainability webpage.	We are committed to continue provide relevant information to our stakeholders. Further information is available on our Sustainability page.

### Future commitments

Universal Store is committed to continue implementing the activities outlined in its Modern Slavery framework to assess, reduce and manage modern slavery risks. We will use the following measures in FY23 to monitor the effectiveness of its actions. These KPIs are monitored and reported in internal monthly reporting.

Focus Area	Measure	Target
Training	Product team completing Supplier Code of Conduct training	100%
	Supplier facing employees completing MS training.	100%
Transparency	Undertake Tier 2 private label suppliers mapping.	100%
	Obtain audits for Tier 2 private label suppliers.	100%
Supplier Code of Conduct	3rd party brands and other business services suppliers with Code of conduct endorsed.	100%

CRITERION 7

# OTHER INFORMATION



The table below outlines where information related to each mandatory reporting criteria can be found:

Mandatory Reporting Criteria		Location of information in this statement	Page
Criterion 1	Identify the reporting entity	About Our Company	Page 04
Criterion 2	Describe the Reporting entity's structure, operation and supply chain	Our Supply Chain	Page 06
Criterion 3	Describe the risk of Modern Slavery practice in the operations and supply chain of the reporting entity, and in any entities that the reporting entity own and controls	Risks of Modern Slavery Practices	Page 10
Criterion 4	Describe the action taken by the reporting entity and any entity it owns or controls, to assess and address those risks, including due diligence and remediation processes	Our Due Diligence Process	Page 12
Criterion 5	Describe how the reporting entity assesses the effectiveness of these actions	Measuring effectiveness	Page 15
Criterion 6	Describe the process of consultation with any entities that the reporting entity own and controls	Consultation	Page 01
Criterion 7	Provide any other relevant information	This table	Page 16

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